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Attorneys for Defendants

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES INVESTOR PROTECTION	:	Adv. Pro. No. 08-01789 (BRL)
CORPORATION,	:	
	:	
Plaintiff,	:	
	:	SIPA Liquidation
v.	:	
	:	
BERNARD L. MADOFF INVESTMENT	:	(Substantively Consolidated)
SECURITIES LLC,	:	
	:	
Defendant.	:	
-----	X	
In re	:	
	:	
BERNARD L. MADOFF,	:	
	:	
Debtor.	:	
-----	X	
IRVING H. PICARD, Trustee for the Liquidation	:	Adv. Pro. No. 10-04377 (BRL)
of Bernard L. Madoff Investment Securities LLC,	:	
	:	Case No.: 11-cv-08480 (JSR)
Plaintiff,	:	
	:	
v.	:	
	:	
CAROL NELSON, <i>et al.</i> ,	:	
	:	
Defendants.	:	
-----	X	

**DEFENDANTS' JOINDER IN MICHAEL GOLDSTEIN'S
SECOND MOTION TO WITHDRAW THE REFERENCE**

The Defendants in the above-captioned action, hereby join in the Second Motion to Withdraw the Reference, and all papers submitted or to be submitted in support thereof, filed by Michael Goldstein in Picard v. Goldstein, Adv. Proc. No. 10-04482 (BRL) (Bankr. S.D.N.Y.); Picard v. Goldstein, No. 11-cv-08491 (S.D.N.Y.). On the same grounds described therein, Defendants respectfully request that the District Court enter an order withdrawing the reference of the above-captioned adversary proceeding pursuant to 28 U.S.C. § 157(d).

Dated: New York, New York
April 2, 2012

KRAMER LEVIN NAFTALIS & FRANKEL LLP

By: /s/ Elise Scherr Frejka

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CERTIFICATE OF SERVICE

I, Elise Scherr Frejka, hereby certify that on the 2nd day of April, 2012, I electronically filed the foregoing Joinder in Michael Goldstein's Second Motion to Withdraw the Reference with the Clerk of the Court using the CM/ECF system which automatically sent notification of such filing to the parties in this action that have elected to receive electronic notification through the CM/ECF system.

/s/ Elise Scherr Frejka
Elise Scherr Frejka